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*Attorney for Defendants Kevin Abernathy,
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LATESHA WATSON,

Plaintiff,

vs.

CITY OF HENDERSON; BRISTOL
ELLINGTON; KEVIN ABERNATHY;
KENNETH KERBY; DEBRA MARCH;
RICHARD DERRICK; RICHARD MCCANN;
NICK VASKOV; KRISTINA GILMORE;
DOES I through X, inclusive,

Defendants.

CASE NO.

Case No.: 2:20-cv-01761-APG-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
KEVIN ABERNATHY, RICHARD
MCCANN AND KENNETH KERBY TO
REPLY TO PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION TO DISMISS
PLAINTIFF'S COMPLAINT AND
MOTION TO DISMISS AND STRIKE
PLAINTIFF'S REQUEST FOR PUNITIVE
DAMAGES**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, Latesha Watson, by and through her counsel, Mark Cook, Esq., of the law firm of Cook & Kelesis, LTD. and Defendants, Kevin Abernathy, Kenneth Kerby and Richard McCann, by and through their counsel of record, Nicholas M. Wieczorek, Esq., of the law firm of Clark Hill PLLC, hereby respectfully submits this Stipulation to extend time for Defendants to reply to Plaintiff, Latesha Watson's, Response [Dkt 46] to Defendants' Motions to Dismiss [Dkt 33], currently due February 23, 2021, an additional five (5) days, up to and including, March 1, 2021.

Although Defendants' counsel has been actively working on the Replies, Defendants' counsel has been unable to complete the Replies due to numerous substantive motions and

responses; as well as other general appearances and deadlines. This request for an extension is made in good faith and not for the purposes of delay.

WHEREFORE, the parties respectfully request that the Defendants' Replies to Plaintiff's Responses to Defendants' Motions to Dismiss, be extended an additional five (5) days, up to and including March 1, 2021.

DATED this 18th day of February 2021.

CLARK HILL PLLC

/s/ Nicholas M. Wieczorek
NICHOLAS M. WIECZOREK, ESQ.
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*Attorney for Defendants Kevin Abernathy,
Richard McCann, and Kenneth Kirby*

DATED this 18th day of February 2021.

COOK & KELESIS, LTD.

/s/ Julie L. Sanpei
MARC P. COOK, ESQ.
Nevada Bar No. 4574
JULIE L. SANPEI, ESQ.
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law@bckltd.com
Attorneys for Plaintiff, Latesha Watson

ORDER

IT IS SO ORDERED.

February 19, 2021
DATED


UNITED STATES DISTRICT COURT JUDGE

From: Julie Sanpei <JSanpei@bckltd.com>
Sent: Thursday, February 18, 2021 3:45 PM
To: Marina, Gia N. <gmarina@ClarkHill.com>
Cc: Marc Cook <MCook@bckltd.com>; Shannon Fagin <SFagin@bckltd.com>; Wieczorek, Nicholas <nwieczorek@clarkhill.com>
Subject: RE: Watson v. City of Henderson

[External Message]

Gia:

You may attach my e-signature.

Julie L. Sanpei

Julie L. Sanpei, Esq.
COOK & KELESIS, LTD.
517 South Ninth Street
Las Vegas, Nevada 89101
(702) 737-7702
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From: Marina, Gia N. <gmarina@ClarkHill.com>
Sent: Thursday, February 18, 2021 3:13 PM
To: Julie Sanpei <JSanpei@bckltd.com>
Cc: Marc Cook <MCook@bckltd.com>; Shannon Fagin <SFagin@bckltd.com>; Wieczorek, Nicholas <nwieczorek@clarkhill.com>
Subject: RE: Watson v. City of Henderson

Thank you for the courtesy, Julie! Attached is the proposed stipulation. Please let me know if I may use e-signature.

Thank you.

Gia N Marina
Associate

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From: Julie Sanpei <JSanpei@bckltd.com>
Sent: Thursday, February 18, 2021 1:27 PM
To: Marina, Gia N. <gmarina@ClarkHill.com>
Cc: Marc Cook <MCook@bckltd.com>; Shannon Fagin <SFagin@bckltd.com>
Subject: Watson v. City of Henderson

[External Message]

Gia:

We have no problem with your request for additional time to prepare a reply to Plaintiff's response. Please send over the Stipulation.

Thanks.

Julie L. Sanpei

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